

**SAMINI BARIC KATZ LLP**  
Bobby Samini, Esq. (SBN 181796)  
Michael Katz, Esq. (SBN 181728)  
Steve Baric, Esq. (SBN 200066)  
John S. Oney IV, Esq. (SBN 338596)  
650 Town Center Drive, Suite 1500  
Costa Mesa, CA 92626  
Telephone: (949) 724-0900  
Fax: (949) 724-0901  
Email: bobby.samini@sbklawyers.com  
Email: michael.katz@sbklawyers.com  
Email: steve.baric@sbklawyers.com  
Email: john.oney@sbklawyers.com

*Attorneys for Plaintiffs Jane Roe 1 and  
Jane Roe 2*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

JANE ROE 1, an individual, JANE  
ROE 2, an individual,

Plaintiffs,

v.

INTERNATIONAL CHURCHES OF  
CHRIST, INC., a California nonprofit  
corporation; THE INTERNATIONAL  
CHRISTIAN CHURCH, INC., a  
California nonprofit corporation; HOPE  
WORLDWIDE, LTD., a Delaware  
nonprofit corporation;  
MERCYWORLDWIDE, a California  
nonprofit corporation; CITY OF  
ANGELS INTERNATIONAL  
CHRISTIAN CHURCH, a California  
nonprofit corporation; THOMAS  
("KIP") McKEAN, an individual; THE  
ESTATE OF CHARLES "CHUCK"

Case No. 2:23-cv-00664-ODW-PLA(x)

**STATUS REPORT RE SERVICE**

STATUS REPORT RE SERVICE

1 LUCAS; AL BAIRD, an individual;  
2 JOE GARMON, SR.an individual and  
3 DOES 1 through 100, inclusive,

4 Defendants.

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1 Plaintiffs JANE ROE 1, JANE ROE 2, (collectively, “Plaintiffs”) hereby submit  
2 this Status Report regarding service as requested by the Court’s Minute Order dated  
3 April 3, 2023 (DKT No. 26).

4 1. Defendant International Churches of Christ, Inc. has not yet been served.  
5 Based upon diligent inquiries conducted by their counsel, Plaintiffs are informed and  
6 believe that the entity known as the “International Churches of Christ” (“ICOC”) is not  
7 a corporation. Rather, it appears to be an “unincorporated association” (within the  
8 meaning of Cal. Corp. Code § 18035). More particularly, ICOC appears to operate as  
9 a “nonprofit association” (within the meaning of Cal. Corp. Code § 18020). Plaintiffs  
10 have not yet determined whether ICOC operates under a “governing document” (within  
11 the meaning of Cal. Corp. Code § 18008). Consequently, the complaint in this case  
12 will either need to be amended to state the correct status of ICOC or ICOC will need  
13 to be served as a DOE Defendant. Plaintiffs’ counsel are conducting searches to  
14 determine whether or not ICOC has recorded in any county in California a “statement  
15 of authority” (within the meaning of Cal. Corp. Code, § 18120). Because the records  
16 of unincorporated associations are not searchable online, Plaintiffs’ counsel are also  
17 submitting to the office of the California Secretary of State written requests to  
18 determine whether or not ICOC has ever filed with the California Secretary of State  
19 either (1) a statement designating the location and complete street address of the  
20 unincorporated association's principal office in this state or (2) a statement designating  
21 an agent of the association for service of process. Simultaneously, Plaintiffs’ counsel  
22 are conducting inquiries to determine whether ICOC utilizes the services of a president,  
23 secretary, or other comparable officers or if there is a person specifically designated by  
24 a resolution adopted by ICOC or by a committee or other body or person authorized to  
25 act by the governing principles of the ICOC upon whom service can be effected. This  
26 process may require that Plaintiffs counsel obtain written discovery or take depositions  
27 of parties to this action if the requisite information is not secured in the course of  
28 mandatory F.R.C.P. Rule 26 disclosures on the part of other named defendants.

1           2. Defendant The International Christian Church, Inc. (“ICC”) was served  
2 with a Notice and Acknowledgment of Receipt of Summons and Complaint (DKT No.  
3 23), filed on March 29, 2023. On May 1, 2023 Counsel for Defendant ICC filed a  
4 stipulation to extend time to respond to May 31, 2023 (DKT No. 35). The Court signed  
5 and entered an Order granting the stipulation on May 8, 2023 (DKT No. 38).

6           3. Defendant Hope Worldwide, Ltd. was served with a Notice and  
7 Acknowledgment of Receipt of Summons and Complaint (DKT No. 21), filed on  
8 March 27, 2023. On April 28, 2023 Hope’s attorney filed a Joint Stipulation to Extend  
9 Time to Respond to Initial Complaint by no More Than 30 Days (DKT No. 32). The  
10 Court signed and entered an Order granting the stipulation extending time to respond  
11 to May 31, 2023 on May 1, 2023 (DKT No. 33).

12           4. Defendant Mercyworldwide (“Mercy”) was served with a Notice and  
13 Acknowledgment of Receipt of Summons and Complaint (DKT No. 25), filed on  
14 March 27, 2023. On May 1, 2023 Counsel for Defendant ICC filed a stipulation to  
15 extend time to respond to May 31, 2023 (DKT No. 35). The Court signed and entered  
16 an Order granting the stipulation on May 8, 2023 (DKT No. 38).

17           5. Defendant City of Angels Christian Church (“City”) was served with a  
18 Notice and Acknowledgment of Receipt of Summons and Complaint (DKT No. 24),  
19 filed on March 27, 2023. On May 1, 2023 Counsel for Defendant ICC filed a  
20 stipulation to extend time to respond to May 31, 2023 (DKT No. 35). The Court signed  
21 and entered an Order granting the stipulation on May 8, 2023 (DKT No. 38).

22           6. On March 8, 2023 Plaintiffs’ counsel sent to Anthony Fernandez of  
23 Quinteros, Prieto, Wood & Boyer, P.A. (the attorneys for Thomas “Kip” McKean) a  
24 complete set of initial documents along with a Waiver of Service of Summons.  
25 Plaintiffs’ counsel has advised Mr. Fernandez of Plaintiffs’ intention to amend the  
26 Complaint within the next thirty (30) days. Mr. Fernandez has responded that he will  
27 hold off on accepting service until the First Amended Complaint has been filed.

28           7. A default by clerk has been entered on defendant The Estate of Charles

1 “Chuck” Lucas.

2 8. On April 20, 2023 Plaintiff’s Counsel sent to Byron J. McLain of Foley  
3 & Lardner LLP (attorneys for Al Baird) a complete set of initial documents along with  
4 a Notice and Acknowledgment. The executed Notice and Acknowledgment was filed  
5 with the court on May 4, 2023 (DKT No. 36). On May 11, 2023 attorneys for Baird  
6 filed a joint stipulation extending Baird’s time to respond to June 22, 2023 (DKT No.  
7 39). The Court signed and entered an Order granting the stipulation to extend time to  
8 respond on May 12, 2023 (DKT No. 40).

9 9. Joe Garmon, Sr. (“Garmon”) was personally served on February 24, 2023  
10 a proof of service was filed with the court (DKT No. 11). On April 28, 2023 Alexander  
11 F. Giovanniello attorney for Garmon filed a joint stipulation extending Garmon’s time  
12 to respond to May 31, 2023 (DKT No. 31). The Court signed and entered an Order  
13 granting the stipulation to extend time to respond on May 1, 2023 (DKT No. 34).

14 **SAMINI BARIC KATZ LLP**

15 Date: May 19, 2023

By: /s/ Bobby Samini

16 Bobby Samini, Esq.

17 Michael Katz, Esq.

18 Steve Baric, Esq.

19 John S. Oney, IV, Esq.

20 Attorneys for Plaintiffs

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)  
3 COUNTY OF ORANGE)

4 I am employed in Orange County. My business address is 650 Town Center  
5 Drive, Suite 1500, Costa Mesa, CA 92626, where this mailing occurred. I am over the  
6 age of 18 years and am not a party to this cause. I am readily familiar with the  
practices of SAMINI BARIC KATZ LLP for collection and processing of  
correspondence for mailing with the United States Postal Service.

7 Such correspondence is deposited with the United States Postal Service the  
8 same day in the ordinary course of business.

9 On May 19, 2023, I served the foregoing documents on the interested parties in  
this action entitled as follows:

10 **STATUS REPORT OF SERVICE**

11 **SEE ATTACHED SERVICE LIST**

12  
13 ☐ **(BY MAIL)** I placed such envelope for collection and mailing on this  
date following ordinary business practices.

14 ☐ **(BY PERSONAL SERVICE)** I caused to be hand delivered such envelope to  
15 the addressee so indicated.

16 ☒ **(BY THE COURT'S ECF SYSTEM):** I caused each such document(s) to  
be transmitted electronically by posting such document electronically to the  
17 ECF website of the United States District Court for the Central District of  
California, on all ECF-registered parties in the action.

18 ☐ **(BY EMAIL)** I caused the above-referenced document(s) to be sent in  
19 electronic PDF format as an attachment to an email addressed to the person(s) on  
whom such documents(s) is/are to be served at the email address(es) shown above as  
20 last given by that person(s) or as obtained from an internet website(s) relating to such  
person(s), and I did not receive an email response upon sending such email indicating  
21 that such email was not delivered.

22 ☒ **(FEDERAL)** I declare that I am employed in the office of a member of the  
bar of this court at whose direction the services was made.

23 Executed on May 19, 2023, at Costa Mesa, California.

24 /s/ Griselda Alfaro

25 Griselda Alfaro

## SERVICE LIST

<p>Andrew J. Waxler, Esq.  John T. Lupton, Esq.  Madeleina Halley, Esq.  Tad A. Devlin  KAUFMAN DOLOWICH &amp;  VOLUCK, LLP  21515 Hawthorne Blvd., Suite 450  Torrance, CA 90503  Telephone: 310-525-9720  Fac: 805-388-3414  <a href="mailto:awaxler@kdvlaw.com">awaxler@kdvlaw.com</a>  <a href="mailto:jlupton@kdvlaw.com">jlupton@kdvlaw.com</a>  <a href="mailto:mhalley@kdvlaw.com">mhalley@kdvlaw.com</a>  <a href="mailto:tdevlin@kdv.com">tdevlin@kdv.com</a></p>	<p><i>Attorneys for Defendant, HOPE  WORLDWIDE, LTD.</i></p>
<p>Alexander F. Giovannniello  Martin R. Boags  GIOVANNIELLO LAW GROUP  One Point Drive, Suite 300  Brea, CA 92821  Telephone: 714-364-4000  Fax: 714-364-4001  Email: <a href="mailto:service@giolawgroup.com">service@giolawgroup.com</a></p>	<p><i>Attorneys for Defendant, JOE  GARMON, SR.</i></p>
<p>Mindee J. Stekkinger  BEACH LAW GROUP  500 E. Esplanade Drive, Suite 1400  Oxnard, California 93036  Telephone:(805)388-3100  Fax:(805)388-3414  Email: <a href="mailto:mail@beachlawgroup.com">mail@beachlawgroup.com</a></p>	<p><i>Attorneys for Defendants, CITY OF  ANGELS INTERNATIONAL  CHRISTIAN CHURCH, THE  INTERNATIONAL CHRISTIAN  CHURCH, INC., and  MERCYWORLDWIDE</i></p>